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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JASON BROTHERTON,

15 Defendant.

Case No. 2:16-mj-620-PAL

STIPULATION TO CONTINUE
PRELIMINARY HEARING
(Fifth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
18 Acting United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel
20 Lazo, Assistant Federal Public Defender, counsel for Jason Brotherton, that the Preliminary
21 Hearing currently scheduled on August 23, 2017 at 4:00 p.m., be vacated and continued to a
22 date and time convenient to the Court, but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. The government has extended Mr. Brotherton an offer. Additional time is
25 needed to finalize the offer into a written plea agreement.
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2. Although defense counsel has discussed the general terms of the offer with Mr. Brotherton, additional time will be needed to fully review the details of the agreement with Mr. Brotherton. Mr. Brotherton's schedule presents a challenge since he works outside the jurisdiction, generally for months at a time.

3. Defendant is not incarcerated and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the fifth request for continuance filed herein.

DATED this 16th day of August, 2017.

RENE L. VALLADARES
Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

/s/ Raquel Lazo
By _____
RAQUEL LAZO
Assistant Federal Public Defender

/s/ Elham Roohani
By _____
ELHAM ROOHANI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JASON BROTHERTON,

7 Defendant.

Case No. 2:16-mj-620-PAL

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 August 23, 2017 at the hour of 4:00 p.m., be vacated and continued to November 21, 2017, at
13 the hour of 4:00 p.m.

14 IT IS FURTHER ORDERED that no further extensions will be allowed.

15 DATED this 22nd of August, 2017.

16 
17 UNITED STATES MAGISTRATE JUDGE